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Illinois Commerce Commission  
**Telecommunications Staff Report**

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**To:** Chairman Richard L. Mathias  
Commissioner Terry S. Harvill  
Commissioner Edward C. Hurley  
Commissioner Ruth K. Kretschmer  
Commissioner Mary Frances Squires

Scott Wiseman  
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**From:** Nancy B. Weber  
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**Subject:** KPMG Consulting's Report to the Illinois Commerce Commission  
Preliminary Metrics Assessment of Ameritech-Illinois

**Date:** August 20, 2001

**CC:** Commissioner's Assistants  
Nora Naughton

**Summary**

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KPMG Consulting delivered the final version of their report for the Preliminary Metrics Assessment (PMA) of Ameritech-Illinois (Attachment 1) to Staff on August 7, 2001. The PMA final report is the work product of KPMG Consulting and communicates its analysis and findings from its evaluation of eleven of SBC/Ameritech Illinois' performance metrics.

This report was provided to SBC/Ameritech on August 8, 2001. On August 15, 2001 SBC/Ameritech provided its reply to KPMG Consulting's PMA report (Attachment 2). The PMA report and SBC/Ameritech's response to the report will be released publicly on August 21, 2001.

The PMA report is divided into two main sections. The first is the Introduction and Report Summary that outlines the basis for conducting the review, the objectives and scope for the PMA, and a high level summary of KPMG Consulting's findings. The second section, Test Results, provides more details on the actual findings. The results are organized by the five main tests conducted during the review. For each test performed, the evaluation methods used and the specific conclusions drawn from each test are discussed.

As mentioned in KPMG's final report, some of the conclusions included in the report were reached at the end of the study. As a result, these conclusions were not necessarily discussed with Staff or Ameritech prior to the report being published. Staff believes that these conclusions were appropriate for KPMG to include in the final report and are inherent in one of

the goals outlined at the beginning of the assessment which was to provide early notification of possible areas of concern prior to the conducting the comprehensive OSS assessment. It is true, as Ameritech states in their response letter, that the evaluations for some of these items were not complete at the end of the PMA. These items will be fully investigated in the comprehensive assessment and Staff believes that KPMG raised these items as areas of concern so Ameritech could begin to focus on them now.

In addition to the results identified by KPMG Consulting in its final report, Staff would like to highlight some additional benefits gained from conducting the preliminary assessment in advance of the full OSS third party test.

- Ameritech personnel were educated on the process KPMG Consulting follows when it conducts a review of a performance measure.
- KPMG Consulting gained knowledge of Ameritech's systems and business processes. Prior to the PMA KPMG Consulting did not have specific knowledge of Ameritech's systems and business processes.
- CLECs, Ameritech, KPMG and Commission Staff developed communication processes and procedures during the preliminary review that will be useful in the full test.

The items identified above and other knowledge gained from conducting the PMA have already made the performance metrics assessment associated with the full OSS review process more efficient and understandable for all parties.

## **Background**

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The Illinois Preliminary Metrics Assessment (PMA) was undertaken pursuant to Condition 29 of the SBC/Ameritech Merger Order, 98-0555, in which the ICC ordered a comprehensive test of Ameritech's OSS and its CLEC-facing operations to assist the Commission in assessing whether Ameritech-Illinois is meeting its merger commitments.

In August of 2000, Staff requested that KPMG Consulting perform a preliminary review of eleven of SBC/Ameritech Illinois' approximately 140 wholesale performance measures in advance of the full third party review process. Three primary goals identified for the preliminary review at the outset were as follows:

- To establish a level of reliability of SBC/Ameritech Illinois' performance measures and standards in advance of the larger, full-blown third party test.
- Provide early notification of areas of concern, if uncovered by this review. This allows SBC/Ameritech a head start in fixing or improving any areas that may be flagged as an area of concern.
- Begin a level of third party testing activities while ICC proceedings and the formal test planning activities take place.

The Preliminary Metrics Assessment was broken down into five discrete segments. For each measure selected, KPMG conducted a full review of Ameritech's definitions and standards, data collection and storage methods, and change management processes. A partial review

was performed on the data integrity, and data replication and calculation of the identified metrics.

The PMA review began in October 2000 and was concluded in April 2001. A decision was made by Staff, KPMG Consulting and Ameritech to end the PMA in April even though all of the work for the preliminary review was not finished. At that time, the Master Test Plan (MTP) had just been finalized and full OSS testing activities were commencing. It was therefore determined that the full OSS review of Ameritech's performance measures would continue where the PMA left off. For this reason the report produced by KPMG Consulting speaks to the state of the review at the point in time the review was concluded.

The eleven metrics reviewed during the PMA are being re-evaluated in the full review of Ameritech Illinois' performance metrics conducted as part of the OSS third party test. The OSS third party review is more intensive than the preliminary review. KPMG will look at a period of three months of data and the data will continue to be evaluated until Ameritech's reported metrics match KPMG's replicated metrics or until any differences can be satisfactorily explained.

KPMG Consulting's final report for the Preliminary Metrics Assessment (PMA) of Ameritech-Illinois was initially provided to Staff on June 18, 2001. This initial report was provided to SBC/Ameritech on June 27, 2001. On July 9, 2001, SBC/Ameritech provided Staff and KPMG with a written reply to KPMG Consulting's PMA report. Staff met with Ameritech to discuss their concerns with the initial report. On July 16, 2001 Staff then met with KPMG Consulting to discuss Ameritech's written response as well as other comments of Staff.

On July 31, 2001 KPMG Consulting provided Staff with a revised version of their final report. Staff met with KPMG Consulting to discuss the July 31, 2001 report and suggested some minor modifications. KPMG Consulting delivered their final PMA report to Staff on August 7, 2001 (Attachment 1). This final report was then provided to Ameritech on August 8 and Ameritech provided a new written response to Staff on August 15, 2001 (Attachment 2). These last two documents, the attachments to this memo, are the documents that will be publicly released.

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**Attachments**

- Attachment 1: Report to the Illinois Commerce Commission – Preliminary Metrics Assessment of Ameritech-Illinois
- Attachment 2: Ameritech Illinois' reply to KPMG Consulting's Report to the Illinois Commerce Commission – Preliminary Metrics Assessment of Ameritech-Illinois

**Report to the  
Illinois Commerce Commission**

**Preliminary Metrics Assessment of  
Ameritech-Illinois**

*Version 1.2  
August 7, 2001*

## **I. Introduction & Report Summary**

### **A. Background**

The Illinois Commerce Commission's approval of the merger of SBC and Ameritech<sup>1</sup> requires Ameritech Illinois to meet numerous objectives, including:

- Provision of just, reasonable and nondiscriminatory access to its operations support systems (OSS);
- Provision of the documentation and support necessary for competitive local exchange carriers (CLECs) to access and use these systems; and
- Demonstration that Ameritech's systems are operationally ready and meet prescribed performance standards.

Pursuant to ICC Order 98-0555 Conditions 29 and 30, the Illinois Commerce Commission (ICC) ordered a comprehensive test of Ameritech's OSS and its CLEC-facing operations to assist the Commission in assessing whether Ameritech-Illinois is meeting these and other merger requirements. The ICC retained KPMG Consulting, Incorporated (KPMG Consulting) to design and conduct a "New York" style evaluation of Ameritech's OSS. As a first step, the ICC asked KPMG Consulting to prepare a Preliminary Metrics Assessment Test Plan (PMATP), and to begin a limited preliminary review of Ameritech's processes and procedures for developing, calculating and reporting several key performance metrics in Illinois.

The purpose of this study was to make a diagnostic assessment in advance of a more comprehensive metrics review. As such, this study was limited in scope and time. Many of the facts, issues and observations made during the study were preliminary in nature.

Goals established for the study included the following:

- Establish a level of reliability of SBC/Ameritech Illinois' performance measures and standards in advance of the comprehensive third party test;
- Provide early notification of areas of concern, if uncovered, thereby allowing SBC/Ameritech a head start in fixing or improving areas that may be flagged with concern;
- Begin a level of third party testing activities while formal ICC proceedings and test planning activities take place; and,
- Initiate a working relationship for the metrics assessment by educating KPMG Consulting about Ameritech's systems, applications and data while also educating Ameritech about the methods and procedures KPMG Consulting uses to conduct a metrics review.

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<sup>1</sup> The terms "Ameritech" and "Ameritech-Illinois" are used interchangeably throughout this document, although it is recognized that these terms may have different meanings in other contexts.

This preliminary review began in October 2000 and was completed in April 2001, after approval of the Illinois Master Test Plan Version 1.0 enabled the full OSS test to begin. The findings of this study shall be used in a more substantial review of Ameritech's performance metrics to be conducted as part of a comprehensive OSS assessment.

## **B. Objectives and Scope**

On a monthly basis, Ameritech-Illinois extracts and assembles data from various databases in its OSS, and reports on these metrics. The business rules for these metrics are comprised of definitions of the measurements, exclusions, calculation descriptions, and levels of measurement disaggregation. The metric values, also known as the performance measures, are reported each month on Ameritech's Performance Measurement web site. Ameritech-Illinois provides registered competitive local exchange carriers (CLECs) the means to download their company specific performance measures, as well as reports for the CLEC aggregate.

The overall objective of this assessment was to evaluate the Ameritech's systems, processes and procedures used in the development and calculation of certain performance metrics. To meet this objective, KPMG Consulting developed a focused evaluation to assess the collection, transfer and storage of certain data, as well as the calculation of certain performance metrics and management of its definitions. This evaluation was structured into five tests covering the following topics:

- PMR1: Data Collection and Storage
- PMR2: Metrics Definitions and Standards Development and Documentation
- PMR3: Metrics Change Management of Standards and Definitions
- PMR4: Metrics Data Integrity
- PMR5: Metrics Calculation and Reporting

The PMA was intended as a "snapshot" view of Ameritech's processing of performance metrics, utilizing data from the data month of October 2000. Eleven Illinois performance metrics, summarized in the table below, were selected for this evaluation.

***Table I-B-1 Preliminary Assessment Metrics Selection***

<b>Business Function</b>	<b>Performance Metric</b>	<b>Disaggregation</b>
Pre-Order, Order and Provisioning (POP)	PM 5 – % Firm Order Confirmations Returned within "X" hours	Manually Submitted – Residential and Business < 24 hours Electronically Submitted – Residential and Business < 5 hours Electronically Submitted – UNE Loop (1-49 loops) < 5 hours
	PM 13 – Order Process % Flow Through	UNE Loops Resale

Business Function	Performance Metric	Disaggregation
	PM 27 – Mean Installation Interval	POTS Residential - Field Work POTS Business - Field Work UNE Combinations – Residential – Field Work UNE Combinations – Residential – No Field Work
	PM 55.1 –Average Installation Interval – DSL	Loop Requiring Conditioning Loops Requiring no Conditioning
	PM 115 – % of Ameritech Caused Delayed Coordinated Cutovers	LNP > 30 minutes LNP w/ Loop > 60 minutes
Billing	PM 17 – Billing Completeness - ACIS/CABS	
Maintenance and Repair (M&R)	PM 24 – Local Operations Center (LOC) Average Speed of Answer	
	PM 38 – % Missed Repair Commitments	POTS – Residence Dispatch POTS – Business Dispatch UNE Combinations – Dispatch
	PM 39 – Average Receipt to Clear Duration	POTS - Residential Dispatch Out of Service (hours) POTS - Business Dispatch Out of Service (hours) UNE – Residential – No Dispatch – Affecting Service UNE – Residential – No Dispatch – Out of Service UNE – Business – Dispatch – Out of Service UNE – Business – No Dispatch – Out of Service
	PM 40 – % Out of Service < 24 Hours	POTS Residential POTS Business UNE Combinations – Business UNE Combinations – Residential
Relationship Management and Infrastructure (RM&I)	PM 107 – % Missed Collocation Due Dates	Physical

### **C. Project Management Overview**

Several communication and project management forums were employed during the study. To facilitate communication and issue management, a working-level call was held each Friday between Ameritech, ICC Staff, and KPMG Consulting. The purpose of these calls was to discuss impediments to testing, note outstanding data necessary for testing, and to provide a project management status to these parties.

In addition to the working level meetings held on Fridays, Preliminary Findings and Findings produced by KPMG Consulting were discussed each week in a call between Ameritech and KPMG Consulting. Representatives from the ICC Staff and the industry were regular participants on these calls.

### **D. Fact-finding and Analysis Impediments**

Based on past experience, KPMG Consulting has found that substantial time and effort are needed during the early stages of metrics assessments for both the assessment team and the company's metrics representatives to both understand and communicate effectively about the data required to conduct the analysis, as well as the systems generating that data. Such circumstances were encountered during this study. For example, KPMG Consulting consolidated the information provided by Ameritech to develop a complete picture of Ameritech's performance measure processes. The varying levels of detail and completeness in the documents provided by Ameritech made that task difficult and time-consuming, although not unusually so. With respect to data replication, KPMG Consulting began receiving October 2000 data for replication from Ameritech-Illinois during the last week of December 2000. KPMG Consulting received the last set of data for replication during the final week of March 2001. Over these 3 months, KPMG Consulting produced many clarification documents, held numerous meetings and conducted frequent conference calls with Ameritech-Illinois in an effort to gather the necessary information. In some cases, however, necessary information was not available or could not be analyzed within the time frame of this study.

### **E. Summary of Important Diagnostic Findings**

During the course of this assessment, KPMG Consulting published emerging findings which documented problems or potential problems with Ameritech's systems or processes. These findings were published and discussed utilizing the Preliminary Findings and Findings process established at the outset of the study. The table below provides the published Preliminary Findings (PF 1 – PF 6) and Findings (F1 & F2) issued by KPMG Consulting during the course of the assessment.



Number	Related Test	Summary of Issue
PF1	PMR5	Ameritech – Illinois’ procedures for archiving and retrieving historical information may be inadequate.
PF2	PMR3	Ameritech – Illinois does not have an established process for archiving old programming codes before such codes are replaced with new ones in the change management process.
PF3	PMR1	Ameritech-Illinois’ data retention procedures are not documented for the following systems: <ul style="list-style-type: none"><li>• Performance Report System (PRS and PRS-Plus)</li><li>• 114_115_Monthly Access database</li></ul>
PF4	PMR5	Ameritech-Illinois does not follow its published Business Rule for calculating Performance Measurement (PM) 107, <i>Percentage Missed Collocation Due Dates</i> .
PF5	PMR5	Ameritech-Illinois changed the October 2000 reported result of Performance Measurement (PM) 107, <i>Percentage Missed Collocation Due Dates</i> , without following proper internal metrics change control procedures.
PF6	PMR1	Ameritech-Illinois does not have a documented process for determining, monitoring and planning capacity utilization for the following systems: <ul style="list-style-type: none"><li>• Automated Call Distribution Call Center Management Information System (ACD CCMIS)</li><li>• Regulatory Reporting System (RRS)</li><li>• 114_115_Monthly Database</li></ul>
F1	PMR3	Ameritech – Illinois does not have a sign-off document that demonstrates that a metrics change has been thoroughly tested and approved by authorized personnel before being migrated to production.
F2	PMR2	Ameritech – Illinois’ process for providing access to previous versions of Business Rules is deficient.

In addition to the Preliminary Findings and Findings, there were numerous other conclusions reached at the end of the study. These findings, although not discussed with Ameritech and ICC Staff during the assessment, are included in this report and are subject to further investigation in the comprehensive OSS test.

## **F. Organization of Results**

In the following sections, KPMG Consulting presents the results of this assessment. A discussion of results is organized by test. Within each test results subsection, the evaluation methods are briefly discussed, followed by a listing of specific results.

Due to the diagnostic nature of this review, it is important for the reader to note that the results of this study are subject to change based on further investigation planned for the comprehensive study. As such, it is to be expected that certain findings presented herein will change while others will be affirmed.

## II. Test Results

### A. Data Collection and Storage Verification and Validation Review (PMA-PMR1)

The purpose of this review was to evaluate key policies and practices for collecting and storing the raw and filtered data necessary for the creation of performance metrics. The business functions, systems, and performance metrics subject to this review are summarized in Table II-A-1, shown below.

**Table II-A-1: PMA-PMR1 Business Functions, Systems and Metrics**

Business Function	Systems	Associated Metric
Pre-Order, Order and Provision (POP)	Mechanized Order/Telephone (MOR/MORtel), EXACT, SOA, Work Force Administration (WFA), Ameritech Customer Information System (ACIS), Mechanized Installation History Reporting (MIHR), Ameritech Service Order Negotiation (ASON), TIRKS, Regulatory Reporting System (RRS), Performance Reporting System (PRS and PRS-Plus), 114_115_Monthly Access Database	PM 5 Percent FOCs returned within "X" Hours PM 13 Order Process % Flow Through PM 27 Mean Installation Interval PM 55.1 Avg. Installation Interval DSL PM 115 Percent of Ameritech Caused Delayed Coordinated Cutovers
Billing	Customer Access Billing System (CABS), ACIS, PRS	PM 17 Billing Completeness ACIS/CABS
Maintenance and Repair (M&R)	Call Center Management Information System (CCMIS), Loop Maintenance Operations Systems (LMOS), Mechanized Trouble Analysis System (MTAS), RRS, PRS	PM 24 LOC Avg. Speed of Answer PM 38 Percent Missed repair Commitments PM 39 Avg. Receipt to Clear Duration PM 40 Percent Out of Service < 24 hours
Relationship Management and Infrastructure (RMI)	Collocation Data Base	PM 107 Percent Missed Co-location Due Dates

### Evaluation Methods

KPMG Consulting reviewed a high-level outline of the data flows used to calculate each of the eleven metrics selected for this assessment. Based upon a review of that documentation, KPMG Consulting was able to identify the systems that were collection points of raw data. These

systems became the focus of interviews and document reviews. KPMG Consulting conducted interviews with Ameritech-Illinois' personnel knowledgeable in the processes and procedures for data collection and storage for these systems and for the data center operations. Interviews were conducted primarily in face-to-face settings at Ameritech-Illinois' offices; several follow-up interviews were conducted by telephone.

## ***Results***

### **1. The documentation of Ameritech-Illinois' data collection and storage processes studied as part of this assessment appear complete and up to date.**

KPMG Consulting reviewed organization charts and the principal documents pertaining to data collection and storage. These documents included the process descriptions and flow diagrams detailed in "Ameritech OSS Performance Measurements Reporting Process Flow" and other documentation. KPMG Consulting also interviewed Ameritech-Illinois' representatives for each of the systems under review. The representatives described the way each system is used in the metrics data collection process. KPMG Consulting's review of this information led to the conclusion that the documentation of data collection and storage processes appear complete and up to date.

### **2. Technical guides describing metrics data collection appear complete and accurate.**

Ameritech-Illinois' representatives provided data flow diagrams describing the metrics collection processes. Based upon the interviews and the data flow documents, KPMG Consulting concluded that the descriptions appear complete and accurate.

### **3. Ameritech-Illinois has procedures in place to ensure effective processing and storage of performance metrics-related data.**

Ameritech-Illinois' representatives for systems operated in data center environments and for systems operated outside data centers were able to describe the capacity usage, forecasts, and plans for all systems under study except ACD/CCMIS (due to its proprietary management by NORTEL). Documentation for RRS and 114\_115 database systems to support Ameritech's descriptions were not provided in time to be included in this assessment.

### **4. Ameritech-Illinois' data collecting systems are designed to include edits to ensure a high degree of accuracy in records used for metrics calculations.**

Ameritech-Illinois' representatives were able to describe the error detection and correction processes for each system. These representatives also described and documented file size tests and samples of individual error types and corrections. KPMG Consulting confirmed the descriptions by reviewing the documents describing error correction processes for the systems analyzed. KPMG Consulting concluded that Ameritech's metrics data collection systems are designed to detect and correct errors.

**5. Ameritech-Illinois has procedures in place to perform regular backups of critical data.**

Ameritech-Illinois' representatives were able to describe the backup processes and media for the systems under review. KPMG Consulting found that Ameritech's backup procedures are designed to support production of the performance metrics. KPMG Consulting found documented recovery plans for all systems under study except CCMIS, PRS, and RRS; plans for these systems were not obtained in time to be included as part of this assessment.

**6. Ameritech-Illinois has policies in place for retaining performance metrics results.**

Based on KPMG Consulting's review of Ameritech's policy plan documents for data retention, Ameritech-Illinois has policies in place for retaining performance metrics results.

**7. Several types of data could not be obtained during this review.**

For example, KPMG Consulting was not able to verify that documentation exists regarding data retention for the 114\_115\_Monthly system. This issue was raised in Preliminary Finding 3.<sup>2</sup> KPMG Consulting also was not able to obtain documented recovery plans for the CCMIS, PRS, and RRS systems. However, the inability to obtain this data did not materially impede this assessment.

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<sup>2</sup> Preliminary Finding 3 stated: Ameritech-Illinois' data retention procedures are not documented for the following systems: Performance Report System (PRS and PRS-Plus), 114\_115\_Monthly Access database.

## **B. Metrics Definitions and Standards Documentation and Implementation Verification and Validation Review (PMA-PMR2)**

The purpose of this test was to evaluate Ameritech's policies and practices for documenting metric definitions (business rules) and reporting metric results. The scope of this test was limited to assessing the adequacy and completeness of procedures for developing, documenting, publicizing, and reporting definitions and results of the key metrics selected for the Preliminary Metrics Assessment. This review included an assessment of the Ameritech-Illinois' metrics business rules version 1.7, which were applicable to Ameritech-Illinois' October 2000 Performance Measurement Report.

### ***Evaluation Methods***

Ameritech-Illinois' metrics business rules define and describe each metric that Ameritech-Illinois is required to report in monthly Performance Measurement reports. The monthly reports document Ameritech-Illinois' calculated values for performance metrics in the areas defined as Pre-Ordering, Ordering, Provisioning, Maintenance and Repair, Network Performance, and Billing. The metrics business rules detail the metrics reporting requirements, including products, geographic breakouts, exclusions, and performance standards.

KPMG Consulting examined the process for developing and documenting the Ameritech-Illinois' metrics business rules version 1.7 to verify that these were consistent with rules approved by the Illinois Commerce Commission. KPMG Consulting also examined whether the October 2000 Ameritech-Illinois CLEC Aggregate Performance Measurement report contained each of the 11 selected measurements, and whether these measurements were reported at level of disaggregation specified by the metrics business rules version 1.7.

### ***Results***

#### **1. The metrics business rules in use by Ameritech-Illinois for October 2000 were consistent with rules approved by the Illinois Commerce Commission.**

KPMG Consulting's interview of Ameritech-Illinois' representatives on the metrics development process, inspection of regulatory filings, and review of other relevant documentation confirmed that the metrics business rules in use by Ameritech-Illinois were consistent with rules approved by the Illinois Commerce Commission.

#### **2. The metrics business rules and performance measurement reports are published through a distribution channel that is accessible by relevant parties.**

Ameritech-Illinois posts metrics business rules on its website in a manner that is accessible to the Illinois Commerce Commission and CLECs. The publication due date mandated by the Illinois Commerce Commission was met for the October 2000 reports.

**3. When a new version of the metrics business rules is published, the older version is removed from the Ameritech website.**

Metrics business rules change with some regularity, but Ameritech-Illinois does not post archived versions of the metrics business rules. The absence of corresponding versions of the metrics business rules makes it difficult to match performance measurement reports with the corresponding version of the metrics business rules used for the generation of those reports. This issue was raised in Finding 2.<sup>3</sup>

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<sup>3</sup> Finding 2 stated: Ameritech-Illinois' process for providing access to previous versions of Business Rules is deficient.

### **C. Metrics Change Management of Standards and Definitions Verification and Validation Review (PMA-PMR3)**

Metrics may undergo changes in definition and new metrics can be added. The purpose of this review was to evaluate Ameritech-Illinois' internal policies and practices for managing changes to the standards, definitions, and calculations of metrics.

#### ***Evaluation Methods***

Test activities included gathering and reviewing Ameritech-Illinois' metrics change management procedure manual, flow charts, and other relevant documents, and interviewing Ameritech-Illinois' metrics change control subject matter experts. KPMG Consulting also reviewed a sample of metrics changes to verify adherence to documented procedures. Finally, KPMG Consulting examined metric changes encountered during the metric replication review (PMA-PMR5).

#### ***Results***

##### **1. The metrics change management process includes a change request document describing relevant information about the change.**

Ameritech-Illinois' metrics change control manual is entitled *Ameritech Performance Measures Change Control Policy and Procedures*. According to this policy, metrics change requests occur in the form of an Enhancement Request (ER) form. This form is completed by the originator of the change and is an e-mail sent to the Change Control Project Manager (CCPM). Additionally, enhancement requests can be conveyed verbally. Change requests are entered directly into the Change Control Database (CCDB). Ameritech's ER form includes the following information: (a) author of the request, (b) date of the request, (c) requested target collection date, (d) description of the change, and (e) the reason for the change.

##### **2. Ameritech's metrics change management process includes a high-level assessment of each requested change.**

Ameritech-Illinois' evaluation procedure makes provision for a high-level assessment of each requested change. The high-level assessment is provided in a Systems Requirement document produced by Ameritech-Illinois' Mechanization team.

##### **3. Metrics changes appear to be approved by the appropriate authority as required at each stage of the metrics change management process.**

Ameritech-Illinois has an approval process in place for metrics change management. The first level of approval is the Performance Measures Change Control Board (PMCCB). All new ERs are captured via an ER Matrix and forwarded to the PMCCB. The PMCCB reviews the requested changes and may approve or reject any of them. KPMG Consulting found that this process was adhered to in 19 out of the 20 changes examined for this assessment.

**4. The metrics change management process provides for the logging and tracking of all changes.**

KPMG Consulting inspected Ameritech-Illinois' primary repository for metrics change information, the Performance Measures Change Control Database (PMCCDB). Based on a review using a sample of change requests, it was determined that changes appear to have been tracked with fair consistency: 8 out of the 9 changes in the sample were tracked accurately and consistently in the database. The one occurrence of a change that was not tracked accurately was raised in Preliminary Finding 5.<sup>4</sup>

**5. The change management process provides for the notification of external parties impacted.**

Based on KPMG Consulting's examination of implementation schedules and Accessible Letters posted to Ameritech's website and changes encountered during this review, Ameritech-Illinois provides notifications of changes to external parties.

**6. The metrics change implementation process requires that a design or technical description of the required change be provided prior to the start of any work.**

KPMG Consulting interviewed Ameritech-Illinois' representatives about documenting the design or technical description of changes to metrics calculations. KPMG Consulting was provided with system requirements documentation used by developers as the specification document needed to code the changes. This review of a sample Ameritech-Illinois' system requirements documents indicated that changes were documented prior to the start of coding changes.

**7. Ameritech-Illinois' metrics change implementation process includes an independent review or walkthrough of the design or technical description of required changes for technical correctness and consistency with the analysis reviewed by Ameritech-Illinois' subject matter experts prior to the start of programming.**

Ameritech-Illinois' representatives indicated that subject matter experts may meet or have a conference call with the developers for a walkthrough of the specifications of the changes if the changes are complicated or if the development staff is new. For minor changes, this walkthrough may be omitted.

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<sup>4</sup> Preliminary Finding 5 stated: Ameritech-Illinois changed the October 2000 reported result of Performance Measurement (PM) 107, *Percentage Missed Collocation Due Dates*, without following proper internal metrics change control procedures.



**8. Ameritech-Illinois' metrics change implementation process requires the documentation of programs and processes affected by or created for the change, including program comments where appropriate.**

KPMG Consulting examined Ameritech-Illinois' internal change control documents and interviewed the personnel involved in the change control process. These interviews and inspections confirmed that Ameritech-Illinois' process includes steps for relevant program documentation for implemented changes.

**9. Ameritech-Illinois' metrics change implementation process requires a thorough testing of the change.**

An examination of Ameritech-Illinois' change management testing procedures indicate that Ameritech-Illinois tests changes before the change is migrated to the production environment. However, during this review, Ameritech – Illinois was unable to provide all of the documentation necessary to demonstrate compliance with its policies during the time period reviewed.

**10. Ameritech-Illinois' metrics change implementation process requires that a version of each process description or program code with relevant documentation previously implemented be preserved prior to the implementation of a change.**

KPMG Consulting examined Ameritech-Illinois' process for archiving old programming code before being replaced by new code. Through interviews and document reviews, KPMG Consulting determined that Ameritech-Illinois takes a snapshot of its MOR/Tel database (code and data) once every month.

**11. The critical steps in the metrics change management process and how those steps are to be performed are documented.**

KPMG Consulting's examination of Ameritech-Illinois' change control manual entitled *Ameritech Performance Measures Change Control Policy and Procedures* supports the conclusion that the key steps in Ameritech-Illinois' change control process are documented.

**12. The roles and responsibilities of the parties involved in the metrics change management process are documented.**

Ameritech-Illinois' change control manual entitled *Ameritech Performance Measures Change Control Policy and Procedures* details the roles and responsibilities of key personnel involved in the change control process.

**13. Metrics changes appear to have followed the documented change management process for changes made for the October 2000 reporting period.**

KPMG Consulting interviewed Ameritech-Illinois' representatives and reviewed internal change control documents including Ameritech's metrics change control database. KPMG

Consulting also selected a sample of changes and traced these change through the different stages of the change control process. The analysis revealed that Ameritech-Illinois followed the documented change management process for all changes to measures reviewed by KPMG Consulting in the October 2000 timeframe.

**14. Formal sign-offs for metrics changes were not found.**

KPMG Consulting discovered that although the change control manual requires a formal sign-off to signify successful testing of a change prior to it being migrated to production, this stipulation was not observed in practice. This issue was raised in Finding 1.<sup>5</sup>

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<sup>5</sup> Finding 1 stated: Ameritech-Illinois does not have a sign-off document that demonstrates that a metrics change has been thoroughly tested and approved by authorized personnel before being migrated to production.

#### **D. Metrics Data Integrity Verification and Validation Review (PMA-PMR4)**

This review evaluated Ameritech's ability to capture data and pass it accurately from system to system for data and systems directly affecting the calculation of selected performance measures. The evaluation was based on document reviews, code inspections, interviews, and a programmatic inspection of data from various systems.

##### ***Evaluation Methods***

During this review, focus was limited to Measures 5 and 27. For these measures, only data that impacted the specific disaggregations included in the PMA were examined. Additionally, smaller-than-normal sampling of data was used. It was also noted that this review included only MOR/Tel, MIHR, and RRS data, and did not necessarily track data from its initial point of entry into the process.

To perform this assessment, KPMG Consulting reviewed available system documentation and source code for systems that directly affected data used in calculating performance metrics for Measures 5 and 27. For both of these measures, KPMG Consulting attempted to perform programmatic verification to determine whether the relevant data was accurate and complete.

After initiating the assessment, it was determined that a thorough data integrity review could not be performed for Measure 5. Because a single system, MOR/Tel, both gathers data and calculates results for Measure 5, KPMG Consulting was unable to compare data coming into MOR/Tel with data actually stored in MOR/Tel. Thus, the only way to evaluate data integrity for this measure would be to replicate it. This replication could not be performed successfully by the conclusion of this assessment, so conclusions about Measure 5 data integrity were not reached.

##### ***Results***

#### **1. The transfer of unprocessed records to processed records appears complete for Measure 27.**

For Measure 27, KPMG Consulting confirmed that every record in the MIHR load files from October 2000 was loaded correctly into RRS.

#### **2. Unprocessed data was transformed accurately to processed data for Measure 27.**

KPMG Consulting confirmed that each field in RRS that affects the calculation of Measure 27 is being populated exactly as Ameritech-Illinois specified.

#### **3. Unexpected records were found in processed data for Measure 27.**

For Measure 27, KPMG Consulting found additional records (33, out of more than 726,000) in the RRS data that had no corresponding record in the originating MIHR data. KPMG

Consulting had not determined the reason for the existence of these additional records by the conclusion of this assessment.

**4. It appeared that an exclusion was not being applied appropriately for Measure 27.**

KPMG Consulting had a concern about the interpretation of the exclusion of “Weekends and Holidays” from the calculation for Measure 27. It appeared that Ameritech calculated a shortened installation interval for orders received or completed on a weekend or holiday. If an order was received on a weekend or holiday, the received date and time that Ameritech used to calculate the installation interval was moved forward to the next business day. Yet, if an order was completed on a weekend or holiday, the completion date and time that Ameritech used to calculate the installation interval was moved backward to the last prior business day. KPMG Consulting did not verify this apparent misinterpretation of the business rule with Ameritech prior to the conclusion of this assessment.

## **E. Metrics Calculation and Reporting Verification and Validation Review (PMA-PMR5)**

The objective of this review was to verify the accuracy of Ameritech-Illinois' performance metrics as reported on its Performance Measurement's web site, and to ensure that these calculations follow Ameritech's published metrics business rules.

The test relied on re-calculating metrics and reconciling any discrepancies found with the reported metrics. For this test, an analysis was performed to determine the consistency between internal systems documentation, published metrics business rules, and program source code used for calculating metrics.

The data KPMG Consulting used to calculate performance measures typically flowed through more than one Ameritech-Illinois' system. Metrics Data Integrity Verification and Validation Review (PMR4) examined the consistency of data as it flowed from system to system, whereas Metrics Calculations Verification and Validation Review (PMR5) verified the accuracy of Ameritech-Illinois' reported performance measures by attempting to recalculate its reported results.

### ***Evaluation Methods***

This assessment focused on Ameritech-Illinois' wholesale data, rather than CLEC data and Ameritech-Illinois' retail data. Due to Ameritech's current data retention policies, some October 2000 data were unavailable.

KPMG Consulting created its own program code to perform a quantitative analysis of the selected metric values for October 2000 as published on the Ameritech-Illinois Performance Measurement web site. While creating its code, KPMG Consulting also performed a qualitative analysis of Ameritech-Illinois' published metrics business rules, systems documentation, and program code. KPMG Consulting made inquiries with Ameritech-Illinois in an attempt to understand and verify discrepancies in cases where KPMG Consulting was unable to replicate Ameritech-Illinois' reported metric results. (In some cases, discrepancies were not fully analyzed by the time this assessment was concluded. These discrepancies were noted for further investigation in the comprehensive OSS test.)

### ***Results***

#### **1. KPMG Consulting was not able to replicate numerous Ameritech-reported metrics values.**

KPMG Consulting was unable to replicate Ameritech-Illinois' results for Measures 5, 13, 17, 27, 55.1, and 115. Additionally, no data exists that would allow KPMG Consulting to replicate Measure 24. More specific information regarding each measure is provided below.

For Measures 5 and 13, KPMG Consulting used data that Ameritech-Illinois extracted from the MOR/Tel system. However, the data that was extracted does not represent the same data used

by Ameritech-Illinois to calculate these measures for October 2000. KPMG Consulting believes this may be the reason it is unable to replicate Ameritech-Illinois' results for these measures. Since January 2001, Ameritech-Illinois has been archiving a copy of the MOR/Tel data as it stood at the time when performance measurements were calculated. This will greatly increase the likelihood that KPMG Consulting would be able to replicate these measures in the future.

For Measure 17, part of the data needed for replication was delivered to KPMG Consulting in a vendor-proprietary format. KPMG Consulting does not have a copy of the vendor's software and therefore was unable to read the data.

For Measures 27 and 115, KPMG Consulting was able to identify specific orders that were included in KPMG Consulting's calculations and not in Ameritech-Illinois' and vice-versa.

For Measure 55.1, KPMG Consulting initially was unsuccessful in attempts to replicate this measure. After further inquiry, KPMG Consulting received a file from Ameritech that was represented to include data used to calculate Ameritech-Illinois' results for Measure 55.1. However, since the file was received at the conclusion of the data analysis effort for this study, and this new data was voluminous and in a different format from the data originally sent, KPMG Consulting estimated that it could not properly analyze the new data in time for results to be included for this report. It was determined that outstanding replication issues for Measure 55.1 would be addressed during the subsequent, more comprehensive review.

For Measure 24, Ameritech-Illinois' system, Automated Call Distribution – Call Center Management Information System, provides information at a summary level, making replication impossible.

**2. For the data reviewed, Ameritech's implemented metrics calculations were not always consistent with the documented metrics calculations.**

For Measures 17, 40, and 107, KPMG Consulting found discrepancies between the logic described in the published metrics business rules and the programmed logic followed in the metrics calculations.

For Measure 17, KPMG Consulting found a discrepancy in the wording of the published metrics Business Rules. The business rule definition correctly indicates that data for Measure 17 comes from both Ameritech's Customer Information System (ACIS) and Ameritech's Carrier Access Billing System (CABS). However, the documented business rule omits a description on the use of information from CABS, and thus appears to only be valid with respect to processing data from ACIS.

For Measure 40, the published metrics business rules state that holidays are excluded from the calculation. Ameritech-Illinois' programming for this measure excludes a trouble report entirely from calculations if the report was received on a holiday, regardless of the length of time it took Ameritech-Illinois to close the report. KPMG Consulting asserts that this is not the intent of the business rule.

For Measure 107, Ameritech-Illinois' programming uses a date other than the ones described in the published metrics business rules to determine whether a collocation due date was missed. The business rule references the following dates: the date the collocation space is turned over to the CLEC, the due date, and the walk-through date. Through conversations with Ameritech, KPMG Consulting learned that Ameritech actually records a "completion date," and uses this date to calculate Measure 107 instead of the walk-through date. The completion date represents the date that Ameritech completed its work, which is not reflected in any of the dates described in the business rules. Although there was no impact on the published results for October 2000, there exists a potential for misreported results in cases where the walk-through date occurs after the completion date. This issue was raised in Preliminary Finding 4.<sup>6</sup>

For Measure 27, KPMG Consulting identified a potential discrepancy regarding the programming that Ameritech-Illinois used to determine the Application Date, Completion Date, and duration (excluding weekends) between the two. It appeared that Ameritech calculated a shortened installation interval for orders received or completed on a weekend or holiday. If an order was received on a weekend or holiday, the received date and time that Ameritech used to calculate the installation interval was moved forward to the next business day. Yet, if an order was completed on a weekend or holiday, the completion date and time that Ameritech used to calculate the installation interval was moved backward to the last prior business day. KPMG Consulting did not verify this apparent misinterpretation of the business rule with Ameritech prior to the conclusion of this assessment.

**3. For the data reviewed, Ameritech's implemented metrics exclusions were not always consistent with the documented metrics exclusions.**

For Measures 17, 27, 38, 39, 40, 55.1, and 115, KPMG Consulting found discrepancies between the exclusions described in the published metrics business rules and those programmed into the metrics calculations. More specific information regarding each measure is provided below.

For Measure 17, the published metrics business rules state that orders with Feature Groups A, B, and D are excluded from the calculation. However, the data used to calculate this measure do not appear to provide a way to identify orders with these feature groups. After raising this issue and discussing it with Ameritech employees on two occasions, it is still not clear to KPMG Consulting how these exclusions are applied. As with the other issues presented in this report, this issue will continue to be investigated during the full-scale OSS assessment.

For Measures 27 and 55.1, the published metrics business rules state that orders "where the CLECs are charged expedite charges" are excluded. KPMG Consulting could not find any mention of this exclusion in the systems documentation provided by Ameritech-Illinois. Also for Measure 55.1, the metrics business rules describe an exclusion of "service requests involving major projects". KPMG Consulting could not find any mention of this in the systems documentation provided. For both measures, KPMG Consulting requested and used (for replication) what it believes is "unfiltered" data. In other words, KPMG Consulting believes

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<sup>6</sup> Preliminary Finding 4 stated: Ameritech-Illinois does not follow its published Business Rule for calculating Performance Measurement (PM) 107, *Percentage Missed Collocation Due Dates*.

this is data against which metrics business rules exclusions have not been applied. Therefore, it appears to KPMG Consulting that these two exclusions are not being applied. This issue will be investigated further during the full-scale OSS evaluation.

For Measures 38, 39, and 40, KPMG Consulting could not find evidence that Ameritech-Illinois was excluding “reports caused by customer provided equipment (CPE) or wiring.” Also, Ameritech’s programming to exclude reports with certain disposition codes does not match the published metrics business rules. For all 3 measures, Ameritech’s programming included additional exclusions not mentioned in the metrics business rules. These exclusions included reports that “relay information to the customer”, duplicate reports, and reports where access to the customer premise was unavailable.

For Measure 115, Ameritech-Illinois applied exclusions that are not documented in the published business rules. KPMG Consulting identified an exclusion based on an order type that is questionable and another exclusion based on the value found in the “customer” field on an order. Systems documentation provided to KPMG Consulting on March 23, 2001 described logic for excluding orders with a value of “LNP” in a field that is supposed to contain customer ACNA codes. On April 3, 2001, Ameritech indicated in an email that “one additional exclusion that is not mentioned” in the systems documentation that “should be applied is to exclude anything with an ACNA of 'LNP'”. This invalid ACNA is included in the details, but is not linked to a customer name so it should be excluded.” KPMG Consulting did not believe that any further investigation of this issue was necessary for the purposes of the diagnostic assessment.

#### **4. All required metrics are included in the Performance Measurement Reports.**

The reports contain the disaggregations as identified in the published metrics business rules.





<b>Exception Report</b>	<b>186</b>	<b>Version</b>	<b>1</b>	<b>Owner</b>	<b>BearingPoint</b>
<b>Issued</b>	<b>February 10, 2003</b>	<b>Test</b>	<b>PMR1</b>	<b>Role</b>	<b>Test Manager</b>
<b>Applicability</b>	<b>Michigan, Illinois, Indiana, Ohio, Wisconsin</b>				

SBC Ameritech has been unable to demonstrate that certain system of record and reporting system data have been retained consistent with regulatory requirements.

## Issue

As part of Metrics Data Collection and Storage (PMR1) testing, BearingPoint has requested sample data and files from SBC Ameritech's systems of record and reporting systems to verify that data is retained. Based on a review of this sample data, SBC Ameritech did not demonstrate that it retained data from certain systems consistent with regulatory requirements.<sup>1</sup> These systems are identified in Exhibit 1 below.

**Exhibit 1 – Reporting System and System of Record Data Retention Results**

<b>System</b>	<b>Oldest Data Currently Retained</b>	<b>Current WI, IL, IN and OH Benchmark</b>	<b>Meeting WI, IL, IN and OH Benchmark?<sup>2</sup></b>	<b>Current MI Benchmark</b>	<b>Meeting Current MI Benchmark?<sup>3</sup></b>
ACIS	January 2002	August 2001	No	January 2001	No
ALPSS	May 2001	August 2001	Yes	January 2001	No
ARIS/EXACT	April 2002	August 2001	No	January 2001	No
CABS	September 2001	August 2001	No	January 2001	No
CAMPS	August 2002	August 2001	No	January 2001	No
CC MIS Wholesale	March 2001	August 2001	Yes	January 2001	No
DUF Parity File	October 2002	August 2001	No	January 2001	No
ICS/DSS	October 2001	August 2001	No	January 2001	No
Manual – Directory Assistance Database Measures	September 2002	August 2001	No	January 2001	No
Manual – EBTA Clear Close	December 2001	August 2001	No	January 2001	No
NSDB	October 2001	August 2001	No	January 2001	No
RBS	August 2001	August 2001	Yes	January 2001	No

As detailed in Exhibit 2, SBC Ameritech has demonstrated that it retained data from certain systems in compliance with requirements, based on a review of sample data.<sup>4</sup>

<sup>1</sup> In the event that SBC Ameritech was unable to provide sample data that confirmed that data was being retained consistent with regulatory requirements, BearingPoint reviewed SBC Ameritech's "System Retention Policy" (SRP) documentation and, in some cases, mainframe system documentation, which indicated that SBC Ameritech had extended the expiration date for data retention to be consistent with regulatory requirements. BearingPoint verified mainframe system documentation for the following systems: ACIS, ALPSS, ARIS/EXACT, CABS, and CAMPS.

<sup>2</sup> Because the data retention requirements in WI, IN, OH and IL are not explicit regarding the type and length of retention, BearingPoint is using a benchmark of 18 months for retention of system of record and reporting system data. Data retention requirements stemming from the Indiana remedy plan, which was released in late October 2002, have not been incorporated into BearingPoint's current analysis due to the fact that SBC Ameritech and IURC have not agreed on an implementation schedule for the plan.

<sup>3</sup> The data retention requirement in Michigan is as follows: "Data should be retained for a minimum of 24 months after the conclusion of the year in which the data was collected or 12 months after the issuance of the audit report, whichever is later." (May 27, 1999 Order, p. 11)

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**Exhibit 2 – Additional Reporting System and System of Record Data Retention Analysis Results**

<b>System</b>	<b>Oldest Data Currently Retained</b>	<b>Current WI, IL, IN and OH Benchmark</b>	<b>Meeting WI, IL, IN and OH Benchmark?</b>	<b>Current MI Benchmark</b>	<b>Meeting Current MI Benchmark?</b>
114_115 Database	September 2000	August 2001	Yes	January 2001	Yes
ACIS <sup>5</sup>	September 2000	August 2001	Yes	January 2001	Yes
ACT	September 2000	August 2001	Yes	January 2001	Yes
ALDIS Data Warehouse	September 2000	August 2001	Yes	January 2001	Yes
ALPSS	May 2001	August 2001	Yes	January 2001	No
ANSIRS/Volumes	September 2000	August 2001	Yes	January 2001	Yes
ARAF Spreadsheet <sup>6</sup>	May 2002	August 2001	Yes	January 2001	Yes
BFR Database	September 2000	August 2001	Yes	January 2001	Yes
BFR Spreadsheet	September 2000	August 2001	Yes	January 2001	Yes
Broadcast Fax Log	September 2000	August 2001	Yes	January 2001	Yes
CC MIS Repair Centers (CSBs)	September 2000	August 2001	Yes	January 2001	Yes
CC MIS Wholesale	March 2001	August 2001	Yes	January 2001	No
CLEC Comparison Report <sup>7</sup>	N/A	August 2001	Yes	January 2001	Yes
CLEC Online Website <sup>8</sup>	March 2001	August 2001	Yes	January 2001	Yes
CLEC Reports, Electronic (IN only)	September 2000	August 2001	Yes	January 2001	Yes
Closed Ticket Disposition Analysis <sup>9</sup>	October 2001	August 2001	Yes	January 2001	Yes
CODES NRD Due Report Final (Weekly Code Activation Spreadsheet)	September 2000	August 2001	Yes	January 2001	Yes
Collocation Database	September 2000	August 2001	Yes	January 2001	Yes
CORAL	September 2000	August 2001	Yes	January 2001	Yes

<sup>4</sup> Exhibits 1 and 2 do not represent an exhaustive list of systems of record and reporting systems.

<sup>5</sup> BearingPoint validated that ACIS data was retained for the Provisioning, Maintenance and Repair and Other measure groups consistent with regulatory requirements.

<sup>6</sup> According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

<sup>7</sup> According to SBC Ameritech, no data has ever been generated for this system because SBC Ameritech has never had a request from a CLEC for this report.

<sup>8</sup> According to SBC Ameritech, this system was not involved in performance reporting before March 2001.

<sup>9</sup> According to SBC Ameritech, this system was not involved in performance reporting before October 2001.

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System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
Electronic Performance Reporting Spreadsheet	September 2000	August 2001	Yes	January 2001	Yes
Error Return Spreadsheet	September 2000	August 2001	Yes	January 2001	Yes
FMOD Database	September 2000	August 2001	Yes	January 2001	Yes
Gateway RT62 <sup>10</sup>	April 2001	August 2001	Yes	January 2001	Yes
ICS/DSS <sup>11</sup>	April 2002	August 2001	Yes	January 2001	Yes
LASR <sup>12</sup>	May 2002	August 2001	Yes	January 2001	Yes
LMOS	September 2000	August 2001	Yes	January 2001	Yes
LOC Scheduler	September 2000	August 2001	Yes	January 2001	Yes
LSMS	September 2000	August 2001	Yes	January 2001	Yes
Manual - AMA Critical Error Display Report	September 2000	August 2001	Yes	January 2001	Yes
Manual - Bill Timeliness	September 2000	August 2001	Yes	January 2001	Yes
Manual - Completion Notification <sup>13</sup>	October 2000	August 2001	Yes	January 2001	Yes
Manual - Directory Assistance Database Measures <sup>14</sup>	September 2000	August 2001	Yes	January 2001	Yes
Manual - Electronic Completions	September 2000	August 2001	Yes	January 2001	Yes
Manual - EOI Network Database <sup>15</sup>	August 2001	August 2001	Yes	January 2001	Yes
Manual - Excluded Blocked Calls Report <sup>16</sup>	February 2001	August 2001	Yes	January 2001	Yes
Manual - Interface Outage Notification	September 2000	August 2001	Yes	January 2001	Yes

<sup>10</sup> According to SBC Ameritech, this system was not involved in performance reporting before April 2001.

<sup>11</sup> According to SBC Ameritech, the data is retained for three years for the following measure groups: Billing, Collocation, Interconnection Trunks, Maintenance and Repair, and 911. According to SBC Ameritech, this system was not involved in performance reporting for these measure groups before April 2002.

<sup>12</sup> According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

<sup>13</sup> According to SBC Ameritech, this system was not involved in performance reporting before October 2000.

<sup>14</sup> BearingPoint validated that Manual – Directory Assistance Database Measures data was retained for the Other measure group consistent with regulatory requirements.

<sup>15</sup> According to SBC Ameritech, this system was not involved in performance reporting before August 2001.

<sup>16</sup> According to SBC Ameritech, this system was not involved in performance reporting before February 2001.

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System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
Manual - Printed Bill Retention	September 2000	August 2001	Yes	January 2001	Yes
Manual - Resend Spreadsheet	December 2000	August 2001	Yes	January 2001	Yes
Manual - Service Feature Availability Information	December 2000	August 2001	Yes	January 2001	Yes
Manual - Statistical Sampling Log	September 2000	August 2001	Yes	January 2001	Yes
Manual Coordinated Conversions	September 2000	August 2001	Yes	January 2001	Yes
Manual Update Information (excluding IN)	September 2000	August 2001	Yes	January 2001	Yes
Manual Update Information (IN only)	September 2000	August 2001	Yes	January 2001	Yes
Mentor	September 2000	August 2001	Yes	January 2001	Yes
MIHR	September 2000	August 2001	Yes	January 2001	Yes
MOR/Tel	September 2000	August 2001	Yes	January 2001	Yes
MPS Browser	September 2000	August 2001	Yes	January 2001	Yes
MTAS	September 2000	August 2001	Yes	January 2001	Yes
Nortel Meridian Max (BCS-ACD)	September 2000	August 2001	Yes	January 2001	Yes
Nortel Meridian Max (LSC-ACD)	September 2000	August 2001	Yes	January 2001	Yes
ORACLE (Website DB)	September 2000	August 2001	Yes	January 2001	Yes
PRS	September 2000	August 2001	Yes	January 2001	Yes
PRS+	September 2000	August 2001	Yes	January 2001	Yes
QMIS	September 2000	August 2001	Yes	January 2001	Yes
RAD (CCC ACD)	September 2000	August 2001	Yes	January 2001	Yes
RBS	August 2001	August 2001	Yes	January 2001	No
Reseller Report TSS tab	September 2000	August 2001	Yes	January 2001	Yes
Results Summary for Stats	September 2000	August 2001	Yes	January 2001	Yes
Returned Weekly Spreadsheet	September 2000	August 2001	Yes	January 2001	Yes
RRS	September 2000	August 2001	Yes	January 2001	Yes
SAS	September 2000	August 2001	Yes	January 2001	Yes
SOA	September 2000	August 2001	Yes	January 2001	Yes
TIRKS	September 2000	August 2001	Yes	January 2001	Yes

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System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
TNDS	September 2000	August 2001	Yes	January 2001	Yes
User Center Admin Database	September 2000	August 2001	Yes	January 2001	Yes
Vantive	October 2000	August 2001	Yes	January 2001	Yes
WebLex <sup>17</sup>	April 2001	August 2001	Yes	January 2001	Yes
WFA/C <sup>18</sup>	November 2000	August 2001	Yes	January 2001	Yes
WFA/DI	September 2000	August 2001	Yes	January 2001	Yes
WFA/DO	September 2000	August 2001	Yes	January 2001	Yes
Work Force Manager (WFM) <sup>19</sup>	May 2002	August 2001	Yes	January 2001	Yes

### **Assessment**

If source data is not retained, annual audits of historical data could be impeded. Attempts to trace errors in the reported results could be hindered by the lack of retention of source data, and SBC Ameritech may not be able to regenerate performance measurement reports as required.

<sup>17</sup> According to SBC Ameritech, this system was not involved in performance reporting before April 2001.

<sup>18</sup> According to SBC Ameritech, this system was not involved in performance reporting before November 2000.

<sup>19</sup> According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

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<b>Observation Report</b>	<b>809</b>	<b>Version</b>	<b>1</b>	<b>Owner</b>	<b>BearingPoint</b>
<b>Issued</b>	<b>February 17, 2003</b>	<b>Test</b>	<b>PMR4 PMR5</b>	<b>Role</b>	<b>Test Manager</b>
<b>Applicability</b>	<b>Michigan, Illinois, Indiana, Ohio, Wisconsin</b>				

SBC Ameritech appears to be using inaccurate data in the calculation of Performance Measurements 10 (“Percent Mechanized Rejects Returned within One Hour of Receipt of Reject in MOR”) and 11 (“Mean Time to Return Rejects”).

### Issue

According to the published business rules<sup>1</sup> for Performance Measurements 10 and 11, “The start time used is the date and time the reject is available to MOR and the end time is the date and time the reject notice is sent to the CLEC.” BearingPoint understands that SBC uses different mechanisms to assign the “time the reject is available to MOR” and the “time the reject notice is sent to the CLEC.”

During the PMR5 (Metrics Calculations and Reporting) test, BearingPoint observed that 43,103 out of 107,435 mechanized reject transactions (40 percent of the total) appear to have negative durations for the July 2002 data month. In other words, each reject appears to have been sent to the CLEC by SBC Ameritech before it was “available” to be sent.

Since it is not logically possible for any transaction to be sent before it is available to be sent (and thus have a negative duration), it appears that SBC Ameritech does not maintain synchronicity between the two applicable time-stamping mechanisms.

Based on assertions by SBC Ameritech and its instructions for calculation, BearingPoint understands that SBC Ameritech adjusts transactions with negative durations to have “0” time durations.<sup>2</sup> While this may mitigate some of the effects of these negative durations, it does not yield accurate performance measurement results for Performance Measurements 10 and 11.

In addition, the lack of server synchronicity likely affects each reject transaction, not only creating negative durations, but also likely making other “positive” durations appear shorter than their actual length.

### Assessment

The data used to calculate reject timeliness measures must reflect the actual transaction time durations in order for regulators and CLECs to rely upon the published results. Inaccurate underlying data necessarily creates inaccurate and confusing results, which cannot be relied upon by regulators and CLECs.

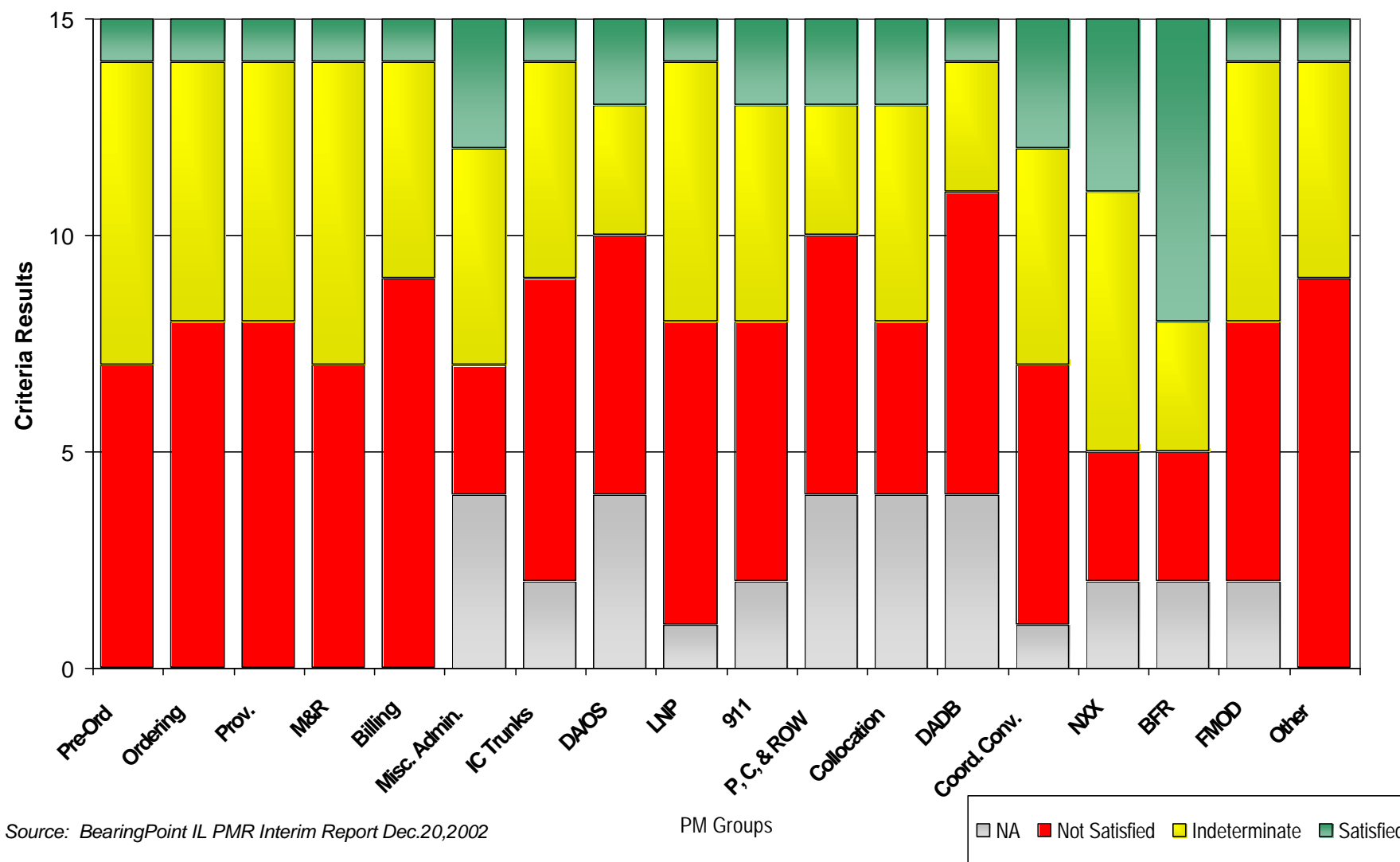
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<sup>1</sup> Version 1.8.

<sup>2</sup> The issue raised in this Observation Report is distinct from the issue identified in Observation Report 584. The negative durations referenced in this Observation Report appear to be caused by a lack of synchronicity between time-stamping mechanisms, rather than being caused by work that was performed during system downtime.

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## PMR1, PMR4, PMR5 Combined Test Results



The following table presents issues of Performance Measure non-compliance that were detected and reported by BearingPoint in the course of its PMR5 testing. These performance measures were found by Ernst and Young to be implemented in the SBC Illinois system consistent with the performance measures Business Rules. There are fourteen (14) BearingPoint observations (i.e., detected errors) in twenty (20) different performance measures that are components of pre-ordering, ordering, provisioning, and coordinated conversion measure groups. The incorrect implementation of business rules has been a significant issue reported by BearingPoint throughout the OSS test. Moreover, the principal work conducted by Ernst & Young in its audit was to determine compliance. These discrepancies bring into question the methodology applied by Ernst & Young.

Except for Observation 741 and 777, each of these Observations remain unresolved as of February 21, 2003. SBC Illinois advised BearingPoint that changes to its systems to correctly implement the business rules according to the BearingPoint findings in Observations 741 and 777 would be made on a going-forward basis only. The incorrect results for July, August, and September will not be restated.

Issue Type	Number	Issue Date	PMs Affected	Issue Description
O	709	11/27/2002	115.2	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement 115.2 (“Percent Provisioning Trouble Reports”) for July, August and September 2002.
O	738	12/10/2002	115.1	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement 115.1 (“Mean Time to Restore – Provisioning Trouble



Issue Type	Number	Issue Date	PMs Affected	Issue Description
				Reports”) for July, August and September 2002.
O	741	12/12/2002	WI 5	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement CLEC WI5 (“Percentage of Protectors Not Moved After Technician Visit”) for the July, August and September 2002 data months.
O	747	12/12/2002	100 and 101	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurements 100 (“Average Time of Out of Service for LNP Conversions”) and 101 (“Percentage Out of Service < 60 minutes”) for the July, August and September 2002 data months.
O	768	12/20/2002	56	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement 56 (“Percent Installations Completed within Customer Requested Due Date”) for July, August, and September 2002.
O	776	12/31/2002	55.1	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement 55.1 “Average Installation Interval - DSL”) for the July 2002 data month.
O	777	12/31/2002	115.1	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement 115.1 (“Percent Provisioning Trouble Reports (PTR) (Rev. 2/20/02)”) for the July, August and September 2002 data months.
O	778	12/31/2002	5.2	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement 5.2 (“Percentage of Unsolicited FOCs by Reason Code”) for the July 2002 data month.
O	785	1/16/2003	110 and 111	SBC Ameritech’s posted results for Performance Measurements 110 (“Percentage of Updates Completed into

Issue Type	Number	Issue Date	PMs Affected	Issue Description
				the DA Database within 72 Hours for Facility Based CLECs”) and 111 (“Average Update Interval for DA Database for Facility Based CLECs”) do not follow the July, August or September 2002 published metrics business rules.
O	786	1/16/2003	120	SBC Ameritech’s posted results for Performance Measurement 120 (“Percentage of Requests Processed Within 30 Business Days”) do not follow the July 2002 published metrics business rules.
O	787	1/16/2003	5, 6, 7, 13.1, MI 9 and MI 13	SBC Ameritech is improperly applying exclusions in the calculation of 6 performance measures for July, August and September 2002.
O	792	1/23/2003	MI 9	SBC Ameritech’s posted results for Performance Measurement MI 9 (“Percentage Missing FOCs”) do not follow the July 2002 published metrics business rules.
O	793	1/23/2003	114, 114.1, 115, 115.1	SBC Ameritech’s posted results for Performance Measurements: 114 (“Percentage of Premature Disconnects (Coordinated Cutovers)”) 114.1 (“CHC/FDT LNP with Loop Provisioning Interval”) 115 (“Percentage of Ameritech Caused Delayed Coordinated Cutovers”) 115.1 (“Mean Time to Restore – Provisioning Trouble Reports”) do not follow the August 2002 published metrics business rules.
O	794	1/23/2003	12	SBC Ameritech’s posted results for Performance Measurement 12 (“Mechanized Provisioning Accuracy”) do not follow the July and August 2002 published metrics business rules.

2/11/2003

# Ameritech OSS Test Open Observations Status Report

ID#	Date Published/ Applicability	Ver	Author/ Test	Brief Description	Status	Notes	Additional Documents
429	5/2/02 Michigan, Illinois, Indiana, Ohio, Wisconsin	4	KPMG Consulting PMR5	KPMG Consulting has been unable to replicate Ameritech's January 2002 reported results for PM 7 ("Percent Mechanized Completions Returned Within One Hour of Completion in Ordering Systems").	Deferred until 2/18	<p><b>May 7:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the May 14 Status Call.</li> </ul> <p><b>May 14:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the May 21 Status Call.</li> </ul> <p><b>May 21:</b></p> <ul style="list-style-type: none"> <li>■ KPMG Consulting reported that they sent an updated result set and data to Ameritech on May 14, and released a "Version 2" of this Observation Report on May 20. Ameritech will review this new data and report.</li> </ul> <p><b>May 29:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the June 4 Status Call.</li> </ul> <p><b>June 4:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the June 12 Status Call.</li> </ul> <p><b>June 12:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech stated that they resolved some MORTEL issues which should address this Observation Report. KPMG Consulting stated that they would like Ameritech to submit a written response to Observation Report. Ameritech stated that the will forward this response.</li> </ul> <p><b>June 18:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the June 25 Status Call in order to provide a response.</li> </ul> <p><b>June 25:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the July 2 Status Call.</li> </ul> <p><b>July 2:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the July 9 Status Call.</li> </ul> <p><b>July 9:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the July 16 Status Call.</li> </ul> <p><b>July 16:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech stated that they responded to this Observation Report on</li> </ul>	

# Ameritech OSS Test Open Observations Status Report

2/11/2003

ID#	Date Published/ State Applicability	Ver	Author/ Test	Brief Description	Status	Notes	Additional Documents
584	7/29/02 Michigan, Illinois, Indiana, Ohio, Wisconsin	2	KPMG Consulting PMR4 PMR5	SBC Ameritech is using inaccurate data in the calculation of Performance Measures 10 ("Percent Mechanized Rejects Returned within 1 hour of receipt of reject in Mor") and 11 ("Mean Time to	Deferred until 2/18	<ul style="list-style-type: none"> <li>Ameritech stated that they are currently working on this issue, which is linked to Exception Report 175 and Observation Report 631. Ameritech deferred discussion of this Observation Report until the January 7 Status Call.</li> <li><b>January 7:</b> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the January 14 Status Call.</li> </ul> </li> <li><b>January 14:</b> <ul style="list-style-type: none"> <li>BearingPoint reported that they received proprietary data from Ameritech on January 14, but have not seen a public response. Ameritech stated that they sent a response for Observation Report on January 14. BearingPoint stated that they will review this response.</li> </ul> </li> <li><b>January 21:</b> <ul style="list-style-type: none"> <li>BearingPoint reported that they received Ameritech's January 14 response, and are reviewing it. BearingPoint also reported that they sent additional questions to Ameritech on January 17. Ameritech deferred discussion of this Observation Report until the February 4 Status Call.</li> </ul> </li> <li><b>February 4:</b> <ul style="list-style-type: none"> <li>BearingPoint reported that they received Ameritech's January 30 response, and are reviewing it. BearingPoint deferred discussion of this Observation Report until the February 11 Status Call.</li> </ul> </li> <li><b>February 11:</b> <ul style="list-style-type: none"> <li>BearingPoint deferred discussion of this Observation Report until the February 18 Status Call.</li> </ul> </li> <li><b>July 30:</b> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the August 6 Status Call.</li> </ul> </li> <li><b>August 6:</b> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the August 13 Status Call.</li> </ul> </li> <li><b>August 13:</b> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the August 20 Status Call.</li> </ul> </li> <li><b>August 20:</b> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the</li> </ul> </li> </ul>	

# Ameritech OSS Test Open Observations Status Report

2/11/2003

ID#	Date Published/ Date Applicability	Ver	Author/ Test	Brief Description	Status	Notes	Additional Documents
				Return Mechanized Rejects").		<p>August 27 Status Call.</p> <p><b>August 27:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the September 4 Status Call.</li> </ul> <p><b>September 4:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the September 10 Status Call.</li> </ul> <p><b>September 10:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the September 17 Status Call.</li> </ul> <p><b>September 17:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the September 24 Status Call.</li> </ul> <p><b>September 24:</b></p> <ul style="list-style-type: none"> <li>■ KPMG Consulting reported that they are reviewing Ameritech's September 22 response.</li> </ul> <p><b>October 1:</b></p> <ul style="list-style-type: none"> <li>■ KPMG Consulting deferred discussion of this Observation Report until the October 8 Status Call.</li> </ul> <p><b>October 8:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint stated that they will forward additional questions to Ameritech, and deferred discussion of this Observation Report until the October 15 Status Call.</li> </ul> <p><b>October 22:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint reported that the sent additional information for this Observation Report on October 21.</li> </ul> <p><b>October 29:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the November 5 Status Call.</li> </ul> <p><b>November 5:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the November 12 Status Call.</li> </ul> <p><b>November 12:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the November 19 Status Call.</li> </ul> <p><b>November 19:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the</li> </ul>	

# Ameritech OSS Test Open Observations Status Report

2/11/2003

ID#	Date Published/ Date Applicability	Ver	Author/ Test	Brief Description	Status	Notes	Additional Documents
587	7/31/02 Michigan, Illinois, Indiana, Ohio, Wisconsin	2	KPMG Consulting PMR5	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement (PM) 2 ("Percent Responses Received Within 'X' Seconds - OSS interfaces").	Deferred until 2/18	<p>November 26 Status Call.</p> <p><b>November 26:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the December 3 Status Call.</li> </ul> <p><b>December 3:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the December 10 Status Call.</li> </ul> <p><b>December 10:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the December 17 Status Call.</li> </ul> <p><b>December 17:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the January 7 Status Call.</li> </ul> <p><b>January 7:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the January 21 Status Call. BearingPoint released an updated version of this Observation Report on January 3.</li> </ul> <p><b>January 21:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the February 4 Status Call.</li> </ul> <p><b>February 4:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech stated that they responded on February 4. BearingPoint stated that they will review this response.</li> </ul> <p><b>February 11:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint stated that they received Ameritech's February 4 response, and are reviewing it. BearingPoint deferred discussion of this Observation Report until the February 18 Status Call.</li> </ul> <p><b>August 6:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the August 13 Status Call.</li> </ul> <p><b>August 13:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the August 20 Status Call.</li> </ul> <p><b>August 20:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the August 27 Status Call.</li> </ul> <p><b>August 27:</b></p>	

# Ameritech OSS Test Open Observations Status Report

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ID#	Date Published/ State Applicability	Ver	Author/ Test	Brief Description	Status	Notes	Additional Documents
625	8/27/02 Michigan, Illinois, Indiana, Ohio, Wisconsin	1	KPMG Consulting PMR5	KPMG Consulting has been unable to replicate SBC Ameritech's January 2002 reported results for Performance Measurement 29 ("Percent Ameritech Caused Missed Due Dates").	Deferred until 2/18	<p><b>February 4:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the February 11 Status Call.</li> </ul> <p><b>February 11:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the February 25 Status Call.</li> </ul> <p><b>September 4:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the September 10 Status Call.</li> </ul> <p><b>September 10:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the September 17 Status Call.</li> </ul> <p><b>September 17:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the September 24 Status Call.</li> </ul> <p><b>September 24:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the October 1 Status Call.</li> </ul> <p><b>October 1:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the October 8 Status Call.</li> </ul> <p><b>October 8:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the October 15 Status Call.</li> </ul> <p><b>October 22:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the October 29 Status Call.</li> </ul> <p><b>October 29:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the November 5 Status Call.</li> </ul> <p><b>November 5:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the November 12 Status Call.</li> </ul> <p><b>November 12:</b></p> <ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the November 19 Status Call.</li> </ul> <p><b>November 19:</b></p>	

# Ameritech OSS Test Open Observations Status Report

2/11/2003

ID#	Date Published/ Rate Applicability	Ver	Author/ Test	Brief Description	Status	Notes	Additional Documents
627	8/27/02 Michigan, Illinois, Indiana, Ohio, Wisconsin	3	KPMG Consulting PMRS	KPMG Consulting has been unable to replicate SBC Ameritech's January 2002 reported results for Performance Measurement 37 ("Trouble Report Rate").	Deferred until 2/25	<ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the November 26 Status Call.</li> <li><b>November 26:</b> BearingPoint reported that they are awaiting additional information from Ameritech on the Network Hierarchy Table. Discussion of this Observation Report is deferred until the December 17 Status Call while Ameritech forwards this information for BearingPoint review.</li> <li><b>December 17:</b> BearingPoint deferred discussion of this Observation Report until the January 7 Status Call.</li> <li><b>January 7:</b> Ameritech deferred discussion of this Observation Report until the January 21 Status Call. BearingPoint released an updated version of this Observation Report on January 3.</li> <li><b>January 21:</b> Ameritech deferred discussion of this Observation Report until the January 28 Status Call.</li> <li><b>January 28:</b> Ameritech deferred discussion of this Observation Report until the February 4 Status Call, and will respond in writing.</li> <li><b>February 4:</b> Ameritech deferred discussion of this Observation Report until the February 18 Status Call.</li> <li><b>September 4:</b> Ameritech deferred discussion of this Observation Report until the September 10 Status Call.</li> <li><b>September 10:</b> Ameritech deferred discussion of this Observation Report until the September 17 Status Call.</li> <li><b>September 17:</b> Ameritech deferred discussion of this Observation Report until the September 24 Status Call.</li> <li><b>September 24:</b> Ameritech deferred discussion of this Observation Report until the October 1 Status Call.</li> <li><b>October 1:</b></li> </ul>	



# Ameritech OSS Test Open Observations Status Report

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ID#	Date Published/ State applicability	Ver	Author/ Test	Brief Description	Status	Notes	Additional Documents
				2002 published metrics business rules.		<p><b>January 21:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint reported that they released an updated version of this Observation Report on January 21. Ameritech deferred discussion of this Observation Report until the February 4 Status Call.</li> </ul> <p><b>February 4:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint reported that they are reviewing Ameritech's February 3 response.</li> </ul> <p><b>February 11:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint reported that they have reviewed Ameritech's February 3 response, which outlined the fact that "scheduled system downtime" is not listed as an exclusion in Performance Measurement 2, and that Ameritech would propose a change to this performance measurement during the next Six-Month Review.</li> <li>■ BearingPoint reported that since Ameritech is currently not calculating this performance measurement according to the business rules, and has no plans to change their current calculation of this performance measurement, there is no further work BearingPoint can perform on this Observation Report. BearingPoint proposed to close this Observation Report.</li> </ul>	
763	12/17/02 Michigan, Illinois, Indiana, Ohio, Wisconsin	1	Bearing- Point PMR5	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement 52 ("Mean Time To Restore") for the July, August, and September 2002 data months.	<b>Deferred until 2/18</b>	<p><b>January 7:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the January 21 Status Call.</li> </ul> <p><b>January 21:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the February 4 Status Call.</li> </ul> <p><b>February 4:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the February 18 Status Call.</li> </ul>	
764	12/17/02 Illinois, Indiana, Ohio, Wisconsin	2	Bearing- Point TVV1	SBC Ameritech manual systems returned unexpected rejects to manual orders submitted according to the Local Service	<b>Deferred until 3/18</b>	<p><b>January 7:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint reported that they sent an updated version of this Observation Report on December 19 to include Illinois applicability. Ameritech stated that there was an Accessible Letter CLECAM02-547 released to address this issue, and that they would also issue a written response. BearingPoint stated that they would review this Accessible Letter.</li> </ul>	

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ID#	Date Published/ Applicability	Ver/ Test	Author/ Test	Brief Description	Status	Notes	Additional Documents
				Ordering Requirements (LSOR) document.		<p><b>January 14:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint stated that they are awaiting Ameritech's written response. Ameritech stated that they would have a response and Accessible Letter by January 17, and deferred discussion of this Observation Report until the January 21 Status Call.</li> </ul> <p><b>January 21:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint reported that they reviewed Ameritech's January 14 response and the related accessible letters. BearingPoint reported that they sent additional information for this Observation Report on January 16, and are reviewing Ameritech's January 20 response.</li> </ul> <p><b>January 28:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint deferred discussion of this Observation Report until the February 4 Status Call. Ameritech stated that they would forward a written response by January 29 to clarify their position.</li> </ul> <p><b>February 4:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint reported that they received Ameritech's January 28 response, which provided the number of an Accessible Letter that addresses the VER system change. BearingPoint stated that they will retest after Ameritech's March 15 change implementation, and deferred discussion of this Observation Report until the March 18 Status Call.</li> </ul>	
766	12/20/02 Michigan, Illinois, Indiana, Ohio, Wisconsin	1	Bearing- Point PMR4	Data fields in SBC Ameritech's processed records for Performance Measure 119 ("Mean Time to Repair") appear to be inconsistent with those in the unprocessed records from SBC Ameritech's source systems for the January 2002 reporting month.	Deferred until 2/18	<p><b>January 7:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the January 21 Status Call.</li> </ul> <p><b>January 21:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech deferred discussion of this Observation Report until the February 4 Status Call.</li> </ul> <p><b>February 4:</b></p> <ul style="list-style-type: none"> <li>■ Ameritech reported that they sent a written response on February 4. BearingPoint stated that they will review this response.</li> </ul> <p><b>February 11:</b></p> <ul style="list-style-type: none"> <li>■ BearingPoint reported that they received Ameritech's February 6 response, and are reviewing it. BearingPoint deferred discussion of this Observation Report until the February 18 Status Call.</li> </ul>	
767	12/20/02	1	Bearing-	Data fields in SBC	Open	<p><b>January 7:</b></p>	

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ID#	Date Published/ State Applicability	Per	Author/ Test	Brief Description	Status	Notes	Additional Documents
	Wisconsin			Performance Measurement 55.1 "Average Installation Interval - DSL") for the July 2002 data month.		<ul style="list-style-type: none"> <li>Ameritech deferred discussion of this Observation Report until the January 28 Status Call.</li> <li><b>January 28:</b> BearingPoint reported that they received Ameritech's January 21 response, which stated that this problem was fixed for August 2002 data. BearingPoint requested that Ameritech clarify whether this issue would be addressed in July 2002 data as well. Ameritech stated that they would review, and deferred discussion of this Observation Report until the February 4 Status Call.</li> <li><b>February 4:</b> Ameritech deferred discussion of this Observation Report until the February 11 Status Call.</li> <li><b>February 11:</b> Ameritech reported that they would not restate July 2002 data. BearingPoint stated that they would further review this issue.</li> </ul>	
778	12/31/02 Michigan, Illinois, Indiana, Ohio, Wisconsin	1	Bearing- Point PMR5	SBC Ameritech is improperly applying exclusions in the calculation of Performance Measurement 5.2 ("Percentage of Unsolicited FOCs by Reason Code") for the July 2002 data month.	<b>Deferred until 2/18</b>	<ul style="list-style-type: none"> <li><b>January 7:</b> Ameritech deferred discussion of this Observation Report until the January 21 Status Call.</li> <li><b>January 21:</b> Ameritech deferred discussion of this Observation Report until the February 4 Status Call.</li> <li><b>February 4:</b> Ameritech deferred discussion of this Observation Report until the February 18 Status Call.</li> </ul>	
784	1/16/03 Wisconsin	1	Bearing- Point PMR4	Data fields in SBC Ameritech's processed records for Performance Measure 2 (Percent Responses Received within "x" Seconds), MI 10 (% Time-Out Transactions) and MI 16 (Percentage Rejected Query	<b>Proposed to Close</b>	<ul style="list-style-type: none"> <li><b>January 21:</b> BearingPoint reported that they sent additional data on January 15. Ameritech deferred discussion of this Observation Report until the February 4 Status Call.</li> <li><b>February 4:</b> BearingPoint stated that they are reviewing Ameritech's January 24 response, and deferred discussion of this Observation Report until the February 11 Status Call.</li> <li><b>February 11:</b> BearingPoint reported that Ameritech's January 24 response provided new information that indicated that the combination of</li> </ul>	